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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**JOINT RESPONSE TO SUBMISSIONS
CONCERNING APPOINTMENT OF A
SPECIAL SETTLEMENT MASTER**

This Document Relates To:

Judge: Hon. Charles R. Breyer

ALL ACTIONS

Courtroom: 6 – 17th Floor

**JOINT RESPONSE TO SUBMISSIONS CONCERNING
APPOINTMENT OF A SPECIAL SETTLEMENT MASTER**

In accordance with the Court's Pretrial Order No. 1, dated October 6, 2023, the parties make the following joint submission regarding the suggestions previously filed by various parties concerning the appointment of a Special Settlement Master (Dkt. Nos. 56, 61, and 63).

While all of the candidates identified by the three submissions are qualified to mediate significant disputes, this case will require a Special Settlement Master with a unique background. Sexual assault cases are different in character than ordinary personal injury cases. Any Special Settlement Master should have experience resolving sexual assault cases and, in particular, experience evaluating and valuing complex personal injury cases of this nature and valuing ongoing trauma.

The parties have conferred, and currently agree to narrow the list of suggested candidates for Special Settlement Master to the following (listed alphabetically):

1. Hon. Gail Andler
2. Hon. Shelley Chapman

The parties welcome the Court's guidance on selecting the appropriate Special Settlement Master, including those who may not have been recommended by either party. But the parties believe this list, which consists of one candidate suggested by Plaintiffs and one candidate suggested by Defendants, is an appropriate list of qualified candidates to serve as the Special Settlement Master. The parties reserve all rights with respect to any proposed order of appointment.

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1 Dated: November 15, 2023

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FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: November 15, 2023

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